

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

HUDA FAKHREDDINE, TROUTT POWELL, and PENN FACULTY FOR JUSTICE IN PALESTINE,)	No. 224-CV-01034
)	CHIEF JUDGE GOLDBERG
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
THE UNIVERSITY OF PENNSYLVANIA,)	PLAINTIFF'S AFFIDAVIT
)	
<i>Defendant.</i>)	

**PLAINTIFF'S AFFIDAVIT IN SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

State of Pennsylvania)
) ss.:
Philadelphia County)

Huda Fakhreddine, being duly sworn, deposes and says:

1. I am over 18 years of age, of sound mind and otherwise competent to make this Affidavit.

The evidence set out in the foregoing Affidavit is based on my personal knowledge.

2. I offer this Affidavit in support of Plaintiffs' Motion for Preliminary Injunction and Temporary Restraining Order (the "Motion") against my employer and Defendant, the University of Pennsylvania ("Penn"), to stop Penn from complying with the U.S. House Congressional Committee on Education and the Workforce's (the "Committee") January 24, 2024 letter (the "Letter") to Penn requesting a wide range of documents and information related to my, the Plaintiffs', and many others' pro-Palestine and anti-Israel scholarship and speech.

3. This Affidavit describes the doxxing¹ and harm I have endured because of my Palestine-related scholarship and advocacy at Penn. This Affidavit also describes the irreparable harm that I will continue to endure at Penn, online, and beyond if Penn continues to comply with the Committee's overbroad request for information targeting my pro-Palestine and anti-Israel advocacy. Specifically, my physical safety, finances, career, reputation, and emotional wellbeing will continue to be irreparably harmed if Penn continues to advance the Committee's efforts. The Committee is attempting to target and silence my Palestine-related scholarship and expression by requesting information relating to my academic freedom to teach about Palestinian literature, my social media posts and campus advocacy criticizing Israel, my involvement in pro-Palestine protests or boycotts against Israeli businesses, sources of funding for a Palestine-related event I organized, and my confidential employee records.
4. I have never felt more emotionally wrecked or fearful for my life and livelihood than I have over the last several months due to the public, incessant hostility that I have endured. My mental wellbeing is the worst it has ever been and I live in constant fear for my safety. The violent public hostility against me has wreaked havoc on my emotional and mental health, financial stability, reputation, career, and my professional and interpersonal relationships. Penn's failure to protect me during this time and its support for the Congressional Committee's public campaign against me has isolated me from the rest of the Penn community and censored my academic and political speech.
5. I am an Associate Professor of Arabic Literature at Penn, where I teach students about

¹ Doxxing is the act of publicly targeting someone and publishing information about them as a form of punishment or revenge for their political speech and/or affiliation. *See Att'y Aff.* ¶¶ 4-5. *See also Dox*, MERRIAM-WEBSTER.COM (last visited Mar. 3, 2024), <https://www.merriam-webster.com/dictionary/doxing>.

Arabic poetry and literature, and their relationship with Arab history and culture. For example, I have taught courses about Arabic literature and literary theory, classical/early Arabic prose, and Arabic poetry from the pre-Islamic to modern eras. I am co-editor of *Middle Eastern Literatures*, an academic journal that publishes academic studies of all Middle Eastern Literatures from Late Antiquity until the present. I am an editor of the Library of Arabic Literature, which publishes print and electronic editions of Arabic literature from as far back as the pre-Islamic era up to today and contains genres such as poetry, fiction, philosophy, history, and more. I have translated and authored a number of publications ranging from classical and modern Arabic poetry to creative non-fiction titles.

6. In my capacity as topic director for the Wolf Humanities Center, I co-organized the annual Palestine Writes Literature Festival, a literature festival that celebrates and promotes the work of Palestinian writers and artists. Events at the festival included panel discussions, music and dance performances, poetry readings, and other Palestinian cultural activities.
7. Throughout 2023, I planned the festival. By mid-August 2023, the festival, and my role in planning it, attracted attention from Zionists keen on canceling it and punishing me for planning it.
8. Pro-Israel entities like the Anti-Defamation League and the Jewish Federations of Greater Philadelphia sent a letter to Penn objecting to Penn hosting the festival and pressuring former Penn President Elizabeth Magill to cancel it. Outside groups also pressured the festival's funders to drop their support.
9. At the same time, the program for the festival and my name and association with the festival were posted online. The speakers listed in the program and I were then subject to a wave of online attacks.

10. Anonymous online accounts and individuals launched an aggressive, incessant doxxing campaign against me. Supporters of this campaign sent me endless hate mail containing threats to my physical safety, life, and career.
11. I feared for my safety. Due to the public hostility I faced, I asked Penn if I could be released from my duties to teach my course for the rest of the fall semester in hopes of protecting my students and I. Additionally, I requested that my office be moved to a more discrete location. Penn did not agree to this request.
12. As part of my Palestine-related advocacy on campus, my colleagues and I staged a walkout—a form of protest where professors walked out of their classrooms as a form of political expression and condemnation of the United States and Israeli governments' genocide in Gaza. I spoke publicly at the action. People on campus who disagreed with my critique of the Israeli government filmed and photographed my walkout. They posted videos and photographs of me online, inviting others to condemn my speech and threaten my life.
13. This catalyzed another vicious, somehow more aggressive wave of doxxing against me. Anonymous doxxers sent me more incessant hate mail including threats containing Islamophobia, sexism, anti-Arab racism, and threats of financial, physical, and sexual violence against me. One individual accused me of being pro-Hamas and said that I should be fired as a result. I forwarded these messages to the Penn administration, which is aware of the abhorrent treatment I have endured..
14. Despite the violence I faced, I was still keen on hosting the festival because of my commitment to my scholarship on Palestinian literature and in educating the Penn campus on Palestinian literature and expression. Myself, my co-organizers, and Penn co-hosted the

festival on Penn's campus. The main ticketed events took place on September 22-24 and several smaller events took place on September 21st.

15. Various university academic departments sponsored the festival, including the Department for Near Eastern Languages and Civilizations, the Cinema and Media Studies Department, Kelly Writers House, the Middle East Center, and the Wolf Humanities Center, as well as Philadelphia-based organizations Al-Bustan Seeds of Culture and the Slought Foundation.
16. Co-organizing the festival was an exercise of my academic freedom as a scholar and professor of Arabic literature at Penn. My goal for the festival was to educate the Penn community on Palestinian literature, poetry, art, culture, history, and politics. My participation in organizing the festival was a large aspect of my academic research and scholarly interest in Arabic and Palestinian literature.
17. Co-organizing the festival was also a core part of my academic duty as the topic director of the Wolf Humanities Center for the 2023-2024 academic year. As the topic director, my job is to curate a calendar of public programming around an annual topic. This academic year's topic is "Revolution," and the Palestine Writes Literature Festival was the first public event in a long list of related events spread out over the course of the year.
18. Despite the festival's connection to my scholarship and job duties, in October 2023, someone posted a petition on Change.org pressuring Penn into firing me for organizing the festival. The petition spread to other websites and became impossible to remove.
19. Then, on December 5, 2023, the House Committee on Education and the Workforce (the "Committee") held a hearing where they questioned the Presidents of Penn, Harvard, and MIT about pro-Palestine and anti-Israel activism on their campuses and inaccurately called this activism antisemitic. The Committee summoned former President Magill, along with

the Presidents of Harvard and MIT, to appear at the hearing. Magill answered the Committee members' questions about pro-Palestine and anti-Israel advocacy on Penn's campus and responded to Congressmembers' false insinuations that it is inherently antisemitic to criticize Israel and support Palestinian rights.

20. During the widely televised hearing, two members of the Committee—Congressman Joe Wilson (R-SC) and Committee chair and Congressman Jim Banks (R-IN)—both mentioned me by name. Citing the title of my course “Resistance Literature from Pre-Islamic Arabia to Palestine,” Congressman Wilson callously stated that I “endorse hatred” and falsely implied that I treat my Jewish students unfairly simply because I teach about Palestine. Congressman Banks even asked Magill why I “still have a job” at Penn.
21. The Committee’s inaccurate accusations, and the public doxxing campaigns, rely on the distorted idea that criticisms of Israel and support for Palestinian human rights are somehow antisemitic. They are not.
22. The federal government, as well as many local and state governments, rely on the International Holocaust Remembrance Alliance (“IHRA”) definition of antisemitism, which asserts that criticism of Israel is antisemitic. The IHRA definition, outlined on the U.S. State Department website, states that “manifestations of [antisemitism] might include the targeting of the state of Israel” and alleges that “claiming that the existence of a State of Israel is a racist endeavor” (i.e., calling it an apartheid state) is antisemitic.²
23. Criticism of Israel is not inherently antisemitic. Use of the IHRA definition wrongfully conflates criticism of Israel as a nation-state and antisemitism. It also impedes debate on university campuses like Penn because it undermines the free speech principles that

² *Defining Antisemitism*, U.S. Department of State (May 26, 2016), <https://www.state.gov/defining-antisemitism/>.

underlie inquiry and critique, whether it be about Israel or any other nation-state and its policies.

24. Ultimately, the claim by the House Committee and anonymous doxxers, alike, that criticism of the Israeli government is inherently antisemitic is an obvious and shameless goal to censor criticism of Israel and stifle pro-Palestine speech.
25. This goal is achieved by publicly ridiculing, vilifying, shaming, and doxxing individuals who criticize Israel and support Palestinian rights to discourage them from expressing their viewpoints.
26. As a result of the House Committee's condemnation against me, I was doxxed on Canary Mission and subject to yet another wave of threats of violence and hate speech targeting my ethnicity, nationality, gender, religion, and political beliefs. The Canary Mission webpage about me contains information targeting my job, involvement in the festival, my editor positions on academic journals, and endless other information that clearly targets my protected identities and Arabic- and Palestine-related scholarship and advocacy.³
27. The Committee is no different from doxxers like Canary Mission or StopAntisemitism. By publicly identifying and targeting me at the December 5 hearing for my criticism of Israel and involvement in the literature festival, the Committee has doxxed me.
28. On January 24, 2024, the Committee sent a letter to Penn (the "Information Letter" or "Letter"), demanding that Penn produce a wide range of documents and information by February 7, 2024 relating to anti-Israel and Palestine-related advocacy on Penn's campus. Just as the Committee did in the December 5 hearing, the Letter targets me and references

³ *Huda Fakhreddine*, Canary Mission (Mar. 31, 2024), https://docs.google.com/document/d/1aXK5jO0vMw73mQcLHYnabNI_xbQL-I-63iB1R6lUgno/edit.

me by name multiple times to assert that my scholarship on Palestinian literature is antisemitic.

29. The Letter demands that Penn produce “[a]ll documents and information” relating to anti-Israel and Palestine-related advocacy on campus.⁴ This includes information related to confidential disciplinary proceedings, sources of funding for the festival, faculty’s social media posts, and faculty’s involvement in pro-Palestine protests and the Boycott Divestment and Sanctions (“BDS”) movement—an international movement calling for the boycott of companies that profit from Israel’s violation of Palestinian human rights.
30. Once again, critiques of Israel or Zionism and involvement in Palestine related advocacy are not antisemitic. However, by requesting documents and activities related to pro-Palestine advocacy, the Letter argues that anti-Israel, pro-Palestine activities, and antisemitism are one in the same.
31. The Letter further requests all reports, documents, and communications referring to antisemitism. Since Congress uses a definition of antisemitism that includes criticism of Israel, the Committee’s request inherently targets anti-Israel and pro-Palestine speech on Penn’s campus.
32. Ultimately, this egregiously overbroad request for information is an attempt by Congress to circumvent my constitutional rights by using Penn—my private employer—as a conduit through which Congress, without immunity, infringes on my constitutional rights by targeting my speech, political association, and academic freedom.
33. Penn’s compliance with the Letter violates the promises it made to me in the 2023-2024

⁴ See Letter from House Comm. on Educ. and the Workforce to Ramanan Raghavendran, Chairman of University of Pennsylvania Board of Trustees, and Larry Jameson, Interim President of University of Pennsylvania (January 24, 2024) at 12 (on file with Plaintiffs).

Faculty Handbook (the “Handbook”), in which it vows to protect all faculty members’ academic freedom, freedom of expression, and right to confidentiality.

34. Penn is interfering with my academic freedom. Due to the Information Letter’s request for information related to the Palestine Writes Literature Festival, and because of Defendant’s compliance with that request, I have been censored and discouraged from continuing my research and maintaining my academic interest in Palestinian literature and poetry.
35. Penn’s production of the requested documents targets, discourages, and restricts my academic freedom in an area of my scholarship, Arabic literature, because Penn is the means through which Congress achieves its goal to doxx and censor me for my Palestine-related advocacy. In other words, my employer is aiding the federal government’s hostile smear campaign against me for my scholarship and academic interest in Palestinian literature. My employer’s compliance with Congress doxxing me for my academic interest in Palestinian literature is a direct, egregious violation of my academic freedom as a professor and scholar in Arabic literature and poetry.
36. Penn also promised to protect my academic freedom from influences outside the University, which includes Congress and pro-Israel interests. Penn violates this commitment because of its compliance with the Committee’s efforts to target me for my teachings on Palestinian literature.
37. As Penn complies with the Letter’s demands, I continue to be subject to isolation and retaliation at Penn.
38. In February 2024, in fulfilling my duties as the Wolf Humanities Center topic director and in continuing the theme of “Revolution,” I organized an event to showcase an Egyptian writer’s work. But my department revoked its co-sponsorship of the event without my

involvement or knowledge. It did so after facing pressure from leadership in the Nursing School, where the event was held, who assumed that it was a pro-Palestine event.

39. I was also unjustly excluded from a faculty meeting. While out of town, I planned to attend the meeting over Zoom, which professors often do, particularly since COVID-19. Zoom links have been consistently provided for faculty who cannot attend in-person meetings. However, the group refused to give me access to a Zoom link and denied my participation in the faculty meeting.

40. More recently, I attempted to send a poem to the email listserv of the Near Eastern Languages and Civilizations Department, of which I am a faculty member. The poem was about Gaza and had a clear connection to my academic scholarship in Arabic poetry and translation studies. However, I received an email from my department rejecting my request to share the poem.

41. Before the doxxing and hate campaign against me, I reasonably expected to begin preparing my file for promotion from an associate to full professor based on my academic achievements and the number of publications I have authored. Various colleagues and administrators at Penn affirmed and supported my decision to go up for promotion. Colleagues helped me prepare a file of my publications and CV in support of a promotion. Now, because of the negative and violent campaign against me, these same staff members no longer encourage my candidacy for a full professorship at this time. In fact, various faculty and staff members are actively discouraging me from pursuing a promotion because of the events of the last several months.

42. Today, I teach with hesitation and fear. I fear not only for my own safety, but that of my students. I continue to teach the Resistance Literature course targeted by the House

Committee at the hearing. However, I asked Penn to remove the classroom number and location where I teach my course from the course list, which is publicly available. I have also moved my class to a room inside a Penn library that requires key card access to enter.

43. Due to Penn's compliance with the House Committee's condemnation of my work and advocacy, I am hesitant to speak on Palestine and host the Palestine Writes Literature Festival or similar public educational event despite the festival's key role in my academic freedom and scholarly interest in Palestinian literature. My goal in co-hosting the festival was to educate the Penn community on Palestinian literature, fulfill my duties as the Wolf Humanities Center topic director, and explore my academic interest. But the price I paid to fulfill my duties as an educator and the topic director was far too high. The doxxing from the House Committee and the public, and Penn's complicity in that doxxing, has silenced my efforts to educate the Penn community on Palestinian literature or my scholarship.

44. Over the last several months, I was subject to a degree of public hate and vitriol that no academic, political advocate, or individual should have to endure simply because of my political viewpoints. The Committee's Letter reflects this sentiment where it suggests that individuals who have not condemned the festival should be fired. Penn's ongoing compliance with the Letter tells me that it could heed that recommendation at any moment.

45. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this day April 6, 2024.



Huda Fakhreddine